

**SQUIRE  
SANDERS**

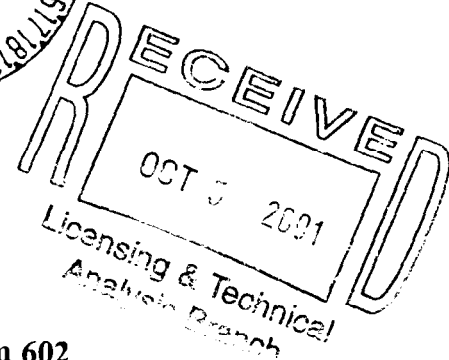
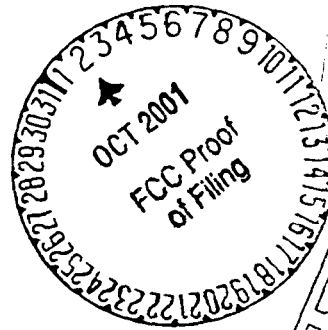
LEGAL  
COUNSEL  
WORLDWIDE

**SQUIRE, SANDERS & DEMPSEY L.L.P.**

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October 1, 2001

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325-7245

**Re: Securicor Communications, Ltd. Filing of FCC Form 602  
(Ownership Disclosure Information for Wireless Telecommunications Services)**

Dear Sir/Madam:

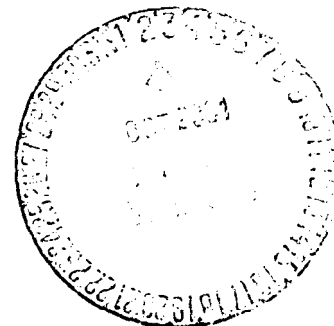
Transmitted herewith, on behalf of Securicor Communications, Ltd. is an original and one copy of a FCC Form 602 ownership report with associated exhibits to be filed with the Commission. Please date stamp the enclosed copy and return in self addressed envelope provided herein.

Should the Commission have any questions relative to the instant application, please contact me at (202) 626-6685.

Respectfully submitted,

Angela M. Simpson

Enclosure



INNATI • CLEVELAND • COLUMBUS • HOUSTON • JACKSONVILLE • LOS ANGELES • MIAMI • NEW YORK • PALO ALTO • PHOENIX • SAN FRANCISCO • WASHINGTON DC

BRATISLAVA • BRUSSELS • BUDAPEST • KYIV • LONDON • MADRID • MOSCOW • PRAGUE

ALMATY • BEIJING • HONG KONG • TAIPEI • TOKYO

ASSOCIATED OFFICES: DUBLIN • MILAN

www.ssd.com

**Applicant/Licensee Information**


|  |     |                                    |         |
|--|-----|------------------------------------|---------|
| 1) First Name (if individual):   | MI: | Last Name:                         | Suffix: |
| 2) Applicant Name (if entity):<br>Securicor <b>Communications</b> , Ltd. |     | 3) Applicant TIN:<br>See Exhibit I |         |

**Related FCC Regulated Businesses of Applicant/Licensee**

| 4a)<br>Name and address of all FCC Regulated Businesses owned by Applicant/Licensee (use additional sheets, if necessary): | 4b)<br>Principal Business: | 4c)<br>TIN: | 4d)<br>Percent of Interest Held: |
|--|----------------------------|-------------|----------------------------------|
| Securicor Wireless Holdings, Inc.  | See Exhibit II             | [REDACTED]  | 100%                             |
| Intek License Acquisition Corp.  | See Exhibit II             | [REDACTED]  | 100%                             |
| Roamer One, Inc.   | See Exhibit XI             | [REDACTED]  | 100%                             |
| Securicor Wireless, Inc.   | See Exhibit II             | [REDACTED]  | 100%                             |
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|  |                            |             |                                  |

**Signature**

5) Typed or Printed Name of Party Authorized to Sign

|   |     |                         |                  |
|---|-----|-------------------------|------------------|
| First Name:<br>Nigel  | MI: | Last Name:<br>Griffiths | Suffix:          |
| Title:<br>Director  |     |                         |                  |
| Signature:<br>   |     |                         | Date:<br>9/28/01 |
| Failure To Sign This Application May Result in Dismissal Of The Application And Forfeiture Of Any Fees Paid   |     |                         |                  |
| WILLFUL FALSE STATEMENTS ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 512(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503). |     |                         |                  |

**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

|  |   |  |   |
|--|---|--|---|
| 1) Disclosable Interest Holder's First Name (if individual):   | MI:   | Last Name:   | Suffix:   |
| 2) Disclosable Interest Holder's Name (if entity):<br>Security Services plc  |   | 3) Disclosable Interest Holder's TIN:<br>See Exhibit I                     |   |
| 4) Disclosable Interest Holder's Address:<br>Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD United Kingdom  |   |  |   |
| 5) Type of Interest in Applicant ( D )<br>(refer to Instructions for list)   | 6) Disclosable Interest Holder is a(n): ( C )<br>(refer to instructions for list of codes): |  | 7) Percent of Interest Held in Applicant:<br>100% |
| 8) Disclosable Interest Holder's Type of Ownership<br>(refer to instructions for list):<br>0 - Ordinary shares with voting rights  |   | 9) Disclosable Interest Holder's Country of Citizenship:<br>United Kingdom |   |
| 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):<br>Securior Communications, Ltd. is a wholly-owned subsidiary of Security Services plc. |   |  |   |

**Related FCC Regulated Businesses of Disclosable Interest Holders** (repeat for each Interest holder Identified)

| 11a)<br>Name and address of all FCC Regulated Businesses<br>owned by Disclosable Interest Holder listed in #3 (use<br>additional sheets, if necessary): | 11b)<br>Principal Business: | 11c)<br>TIN: | 11d)<br>Percent of<br>Interest Held: |
|---|-----------------------------|--------------|--------------------------------------|
| Securior Wireless Holdings, Inc.  | See Exhibit II              |              | 100%                                 |
| Roamer One, Inc.  | See Exhibit II              |              | 100%                                 |
| Intek License Acquisition, Corp.  | See Exhibit II              |              | 100%                                 |
| Securior Wireless, Inc.   | See Exhibit II              |              | 100%                                 |
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**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

|  |  |  |  |
|--|--|--|--|
| 1) Disclosable Interest Holder's First Name (if individual):   | MI:  | Last Name:   | Suffix:  |
| 2) Disclosable Interest Holder's Name (if entity):<br>Securicor (1996) plc   |  |  | 3) Disclosable Interest Holder's TIN:<br>See Exhibit I |
| 4) Disclosable Interest Holder's Address:<br>Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD United Kingdom  |  |  |  |
| 5) Type of Interest in Applicant ( I )<br>(refer to Instructions for list)   | 6) Disclosable Interest Holder is a(n): ( C )<br>(refer to instruction.5 for list of codes): |  | 7) Percent of Interest Held in Applicant:<br>100%      |
| 8) Disclosable Interest Holder's Type of Ownership<br>(refer to instructions for list):<br>0 - Ordinary shares with voting rights  |  | 9) Disclosable Interest Holder's Country of Citizenship:<br>United Kingdom |  |
| 10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):<br>Security Services, plc is a wholly-owned subsidiary of Securicor (1996) plc. |  |  |  |

**Related FCC Regulated Businesses of Disclosable Interest Holders** (repeat for each Interest holder identified)

| 11a)<br>Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheet, if necessary): | 11b)<br>Principal Business: | 11c)<br>TIN: | 11d)<br>Percent of Interest Held: |
|--|-----------------------------|--------------|-----------------------------------|
| Securicor Wireless Holdings, Inc.  | See Exhibit II              |              | 100%                              |
| Roamer One, Inc.   | See Exhibit II              |              | 100%                              |
| Intek License Acquisition Corp.  | See Exhibit II              |              | 100%                              |
| Securicor Wireless, Inc.   | See Exhibit II              |              | 100%                              |
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Schedule for **Disclosable Interest Holders****Disclosable Interest** Holder Information (complete as many as required to describe all **disclosable** interest holders)

|   |   |   |  |
|---|---|---|--|
| 1) <b>Disclosable Interest Holder's</b> First Name (if individual):   | MI:   | Last Name:  | Suffix:  |
| 2) <b>Disclosable Interest Holder's</b> Name (if entity):<br>Securicor plc  |   | 3) <b>Disclosable Interest</b> Holder's TIN:<br>[REDACTED]                        |  |
| 4) <b>Disclosable Interest Holder's</b> Address:<br>Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD United Kingdom  |   |   |  |
| 5) <b>Type of Interest</b> in Applicant ( )<br>(refer to instructions for list)   | 6) <b>Disclosable Interest</b> Holder is a(n): ( C )<br>(refer to instructions for list of coda): |   | 7) <b>Percent</b> of Interest Held in Applicant:<br>100% |
| 8) <b>Disclosable Interest Holder's</b> Type of Ownership<br>(refer to instructions for list):<br>0 - Ordinary shares with voting rights  |   | 9) <b>Disclosable Interest Holder's</b> Country of Citizenship:<br>United Kingdom |  |
| 10) <b>Relationship Description</b> (if the <b>disclosable</b> interest holder is an indirect owner, list path of ownership from Indirect owner to the applicant):<br>Securicor (1996) is a wholly-owned subsidiary of Securicor plc. |   |   |  |

**Related FCC Regulated Businesses of Disclosable Interest Holders** (repeat for each interest holder identified)

| 11a)<br>Name and address of all FCC Regulated Businesses owned by <b>Disclosable</b> Interest Holder listed in #3 (use additional sheets, if necessary): | 11b)<br>Principal Business: | 11c)<br>TIN: | 11d)<br>Percent of Interest Held: |
|--|-----------------------------|--------------|-----------------------------------|
| Securicor Wireless Holdings, Inc.  | See Exhibit II              | [REDACTED]   | 100%                              |
| Roamer One, Inc.   | See Exhibit II              | [REDACTED]   | 100%                              |
| Intek License Acquisition, Corp.   | See Exhibit II              | [REDACTED]   | 100%                              |
| Securicor Wireless, Inc.   | See Exhibit II              | [REDACTED]   | 100%                              |
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**Exhibit I**

**Response to Question 3 on Main Form and Schedule A**

Securicor Communications, Ltd. does not have a Taxpayer Identification Number ("TIN") because it is not a U.S. company. The FCC has assigned A00005821 as its identification number.

Security Services plc does not have a TIN because it is not a U.S. company.

Securicor (1996) plc does not have a TIN because it is not a U.S. company.

**Exhibit II**

**Response to Items 4b, 11a and 11b, FCC Form 602 Schedule A**

**SECURICOR WIRELESS HOLDINGS, INC.**

99 Park Avenue  
18<sup>th</sup> Floor  
New York, NY 10016-1601

Securicor Wireless Holdings, Inc. (formerly Intek Global Corp.), through its wholly owned subsidiaries, is a nationwide provider of mobile radio equipment and services authorized pursuant to Part 90 of the FCC's rules.

**ROAMER ONE, INC.**

6020 Paretta  
Kansas City, MO 64120

Roamer One, Inc. owns and operates Private Mobile Radio Services ("PMRS") stations in the 220-222 MHz frequency band and manages systems on behalf of other licensees in that band.

**INTEK LICENSE ACQUISITION CORP.**

6020 Paretta  
Kansas City, MO 64120

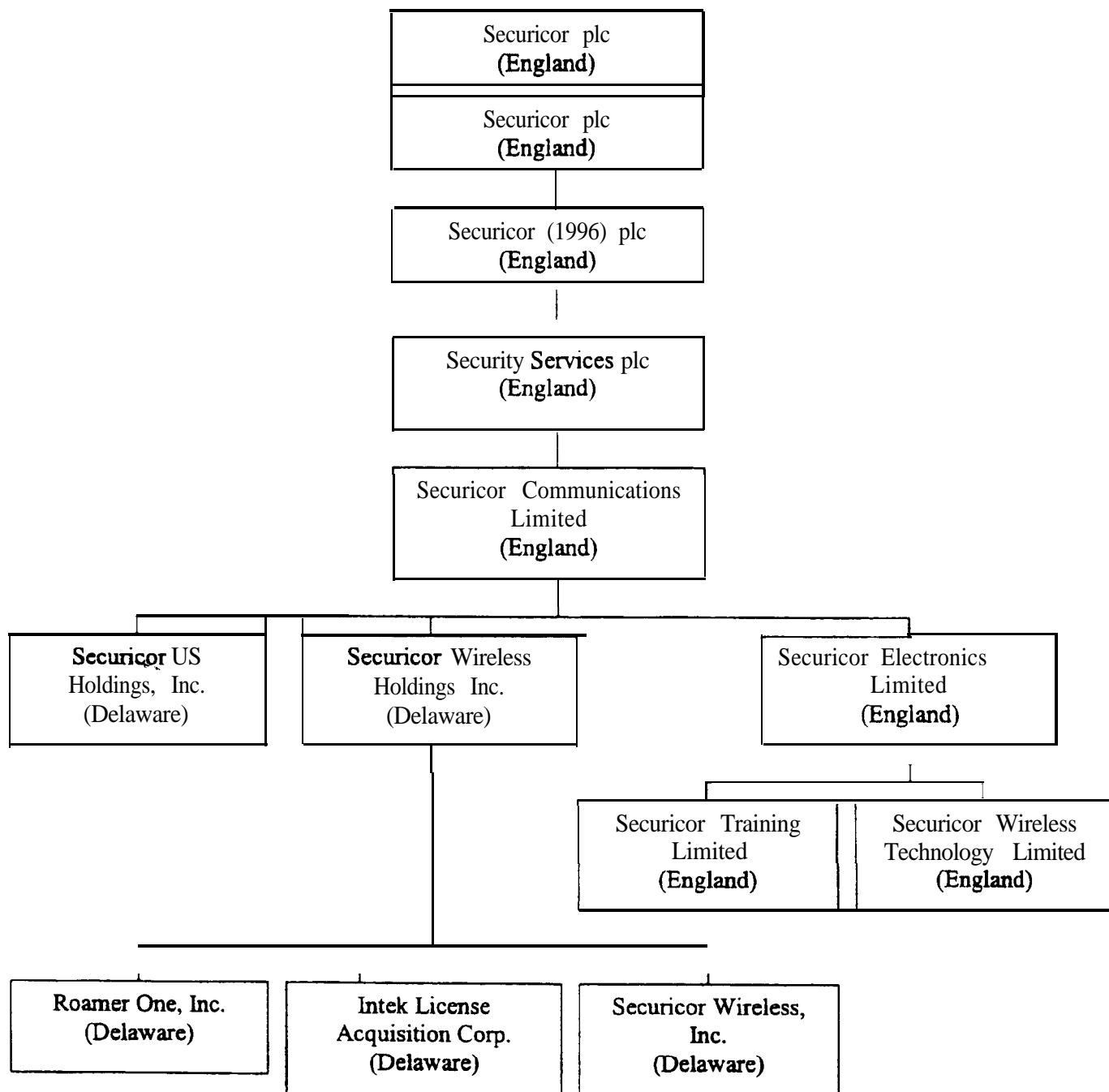
Intek License Acquisition Corp. is a company established to participate in FCC spectrum auctions and to hold licenses won at such auctions.

**SECURICOR WIRELESS, INC.**

6020 Paretta  
Kansas City, MO 64120

Securicor Wireless, Inc. (formerly Midland USA, Inc.) distributes land mobile products and equipment including equipment operating in the 220-222 MHz frequency band.

(All companies are 100% owned by parent)





### Exhibit III

#### Clarification of Question 10, Form 602, Schedule A

The following provides a complete description of ownership. An **“Ownership Structure Chart”** is attached for convenience.

Securicor Communications, Ltd. is a wholly owned subsidiary of Security Services plc, a corporation organized under the laws of England and Wales with offices Sutton Park House, 15 Carshalton Road, Sutton, Surrey **SM1 4LD**, United Kingdom. Security Services, plc, in turn, is a wholly owned subsidiary of Securicor (1996) plc, a corporation organized under the laws of England and Wales with **offices** at Sutton Park House, 15 Carshalton Road, Sutton, Surrey **SM1 4LD**, United Kingdom. Securicor (1996) plc, is in turn, a wholly owned subsidiary of Securicor plc (“Securicor”), with offices at Sutton Park House, 15 Carshalton Road, Sutton, Surrey **SM1 4LD**, United Kingdom. Securicor is a publicly-traded corporation also organized under the laws of England and Wales, with headquarters at Sutton Park House, 15 Carshalton Road, Sutton, Surrey **SM1 4LD**, United Kingdom. Securicor is 100% publicly owned, with no single entity having a 10% or greater ownership interest.

Accordingly, Securicor, through the intervening wholly owned **subsidiaries** described above, holds a 100% interest in Securicor Communications, Ltd., which holds a 100% interest in Securicor Wireless Holdings, Inc., a Delaware corporation with headquarters at 99 Park Avenue, 18<sup>th</sup> Floor, New York, New York 10016, and its U.S. subsidiaries, Roamer One, Inc., Securicor Wireless, Inc. and Intek License Acquisition Corp., Delaware corporations with **offices** at 6020 Paretta, Kansas City, Missouri, 64120.<sup>1</sup>

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<sup>1</sup> On November 30, 1999, the **Commission** granted Securicor Wireless Holdings, Inc.’s Supplemental Declaratory Ruling and found that its foreign ownership served the public interest. *See* International Authorizations Granted; Section 214 Applications; Cable Landing License Applications; Requests to Authorize Switched Services over Private Lines; Section 310(B)(4) Requests, *Public Notice*, 15 FCC **Rcd** 1585 (1999).